

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:**

**TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001**

**03-MDL-1570 (GBD)(SN)**

**SAUDI ARABIA  
NOTICE OF AMENDMENT**

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This document relates to: ASHTON V. KINGDOM OF SAUDI ARABIA,

No. 17-CV-2003(GBD)(SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Kingdom of Saudi Arabia. The underlying Complaint is deemed amended to include the factual allegations, jurisdictional allegations, and jury trial demand, as indicated below, of (a) the Consolidated Amended Complaint as to the Kingdom of Saudi Arabia, ECF No. 3463, or (b) the Complaint Against the Kingdom of Saudi Arabia, Ashton v. Kingdom of Saudi Arabia, No. 17-CV-2003 (GBD)(SN) (S.D.N.Y. Mar. 30, 2017), ECF No. 1, as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Kingdom of Saudi Arabia and does not apply to any other defendant.

Upon filing this Saudi Arabia Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as

specified below; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

### CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference the following factual allegations, jurisdictional allegations, and jury trial demand in the following complaint [check only one complaint] and the following causes of action set forth in that complaint:

- ☐ **Consolidated Amended Complaint as to the Kingdom of Saudi Arabia, ECF No. 3463 (check all causes of action that apply)**
- ☐ COUNT I – Aiding and Abetting and Conspiring with Al Qaeda to Commit the September 11th Attacks upon the United States in violation of 18 U.S.C. § 2333(d) (JASTA).
- ☐ COUNT II – Aiding and Abetting and Conspiring with Al Qaeda to Commit the September 11th Attacks upon the United States in violation of 18 U.S.C. § 2333(a).
- ☐ COUNT III – Committing Acts of International Terrorism in violation of 18 U.S.C. § 2333.
- ☐ COUNT IV – Wrongful Death.
- ☐ COUNT VI – Alien Tort Claims Act.
- ☐ COUNT VII – Assault and Battery.
- ☐ COUNT VIII – Conspiracy.
- ☐ COUNT IX – Aiding and Abetting.
- ☐ COUNT X – Intentional Infliction of Emotional Distress.
- ☐ COUNT XII – Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Supervising Employees and Agents.
- ☐ COUNT XIII – Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Hiring, Selecting, and Retaining Employees and Agents.
- ☐ COUNT XIV – 18 U.S.C. § 1962(a)–(d) – CIVIL RICO.

☐ COUNT XV – Trespass.

☐ COUNT XVI – Violations of International Law.

☒ **Complaint Against the Kingdom of Saudi Arabia, Ashton v. Kingdom of Saudi Arabia, No. 17-CV-2003 (GBD)(SN) (S.D.N.Y. Mar. 30, 2017), ECF No. 1 (check all causes of action that apply)**

☒ First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

☒ First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

☒ Second Cause of Action for Wrongful Death Damages Pursuant to State Tort Law

☒ Second Cause of Action for Personal Injury Damages Pursuant to State Tort Law

☒ Third Cause of Action for Wrongful Death Damages Pursuant to the Alien Tort Claims Act

☒ Third Cause of Action for Personal Injury Damages Pursuant to the Alien Tort Claims Act

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>Plaintiff's Name (alphabetical by last name)</b>	<b>Plaintiff's State of Residency at filing (or death)</b>	<b>New Plaintiff's Citizenship/N ationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
1	Bradshaw, Alexandria N.	NC	USA	Bradshaw, Sandra W.	Child	N/A
2	Bradshaw, Nathan G.	NC	USA	Bradshaw, Sandra W.	Child	N/A
3	Bradshaw, Shenan M.	GA	USA	Bradshaw, Sandra W.	Stepchild	N/A
4	Curran, Mary Lou	NY	USA	Pascuma, Jr., Michael J.	Personal Representative of the Estate of Michael Pascuma, deceased Parent of 9/11 Decedent Michael J. Pascuma, Jr.	N/A
5	Curran, Mary Lou	NY	USA	Pascuma, Jr., Michael J.	Personal Representative of the Estate of Ada Pascuma, deceased Parent of 9/11	N/A

	<b>Plaintiff's Name (alphabetical by last name)</b>	<b>Plaintiff's State of Residency at filing (or death)</b>	<b>New Plaintiff's Citizenship/N ationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
					Decedent Michael J. Pascuma, Jr.	
6	deJong, Kristina M.	N/A	Canadian	Pelletier, Michel	Sibling	N/A
7	Mercado, Anthony	FL	USA	Mercado, Steve	Sibling	N/A
8	Mercado, Jr., Louis	NY	USA	Mercado, Steve	Sibling	N/A
9	Mercado, Mary	FL	USA	Mercado, Steve	Parent	N/A
10	Mercado, Sr., Louis	FL	USA	Mercado, Steve	Personal Representative of the Estate of Louis Mercado, Sr., deceased Parent of 9/11 Decedent Steve Mercado	N/A
11	Pascuma, Christopher	NY	USA	Pascuma, Jr., Michael J.	Child	N/A
12	Pascuma, Melissa	NY	USA	Pascuma, Jr., Michael J.	Child	N/A
13	Pascuma, Michael	NY	USA	Pascuma, Jr., Michael J.	Child	N/A
14	Pelletier, Daniel A.	N/A	Canadian	Pelletier, Michel	Sibling	N/A

	<b>Plaintiff's Name (alphabetical by last name)</b>	<b>Plaintiff's State of Residency at filing (or death)</b>	<b>New Plaintiff's Citizenship/N ationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
15	Pelletier, Lillian	N/A	Canadian	Pelletier, Michel	Parent	N/A
16	Pelletier, Marcel O.	N/A	Canadian	Pelletier, Michel	Parent	N/A
17	Pelletier, Ronald A.	N/A	Canadian	Pelletier, Michel	Sibling	N/A
18	Pelletier- Martinelli, Sophie	CT	USA	Pelletier, Michel	Parent and legal guardian on behalf of N.P., minor child of 9/11 Decedent Michel Pelletier	N/A
19	Ryan, Autumn	FL	USA	Ryan, Jonathan S.	Child	N/A
20	Ryan, Deena	NY	USA	Ryan, Jonathan S.	Parent	N/A
21	Ryan, Robert	FL	USA	Ryan, Jonathan S.	Parent	N/A
22	Ryan- Baldwin, Maria L.	FL	USA	Ryan, Jonathan S.	Parent and legal guardian on behalf of C.R., minor child of 9/11 Decedent Jonathan S. Ryan	N/A
23	Saada Samuel, Delphine	NY	USA	Saada, Thierry	Parent and legal guardian on behalf of L.S., minor	N/A

	<b>Plaintiff's Name (alphabetical by last name)</b>	<b>Plaintiff's State of Residency at filing (or death)</b>	<b>New Plaintiff's Citizenship/N ationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
					child of 9/11 Decedent Thierry Saada	
24	Uman, Alexander T.	CT	USA	Uman, Jonathan	Child	N/A
25	Uman, Julie	CT	USA	Uman, Jonathan	Parent and legal guardian on behalf of A.U., minor child of 9/11 Decedent Jonathan Uman	N/A

Dated: November 18, 2018

Respectfully submitted,

KREINDLER & KREINDLER LLP

BY: /s/ James P. Kreindler

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